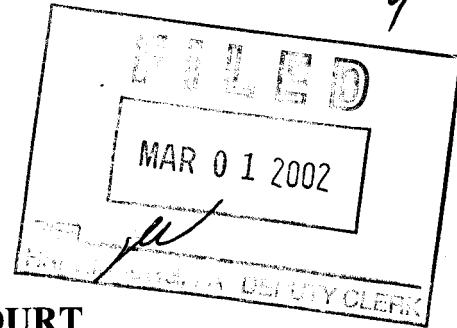


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**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

GARY D. WILLIAMS, PHILLIP J.
SNYDER, DAWN L. STROHECKER
PLAINTIFFS

v.

HENSON TRANSPORT, INC., HENSON
TRUCK LEASING, INC., and BARRY
HENSON,

DEFENDANTS

CONSOLIDATED NO. 1:CV-00-1838

✓
(JUDGE SYLVIA H. RAMBO)

JURY TRIAL DEMANDED

**EXHIBITS ACCOMPANYING DEFENDANTS' MEMORANDUM IN
OPPOSITION TO PETITIONS FOR ATTORNEY FEES AND
LIQUIDATED DAMAGES OF PLAINTIFFS WILLIAMS,
SNYDER, AND STROHECKER**

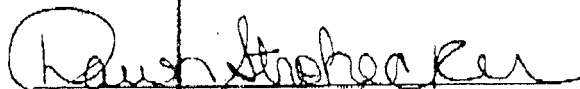
CONTINGENCY FEE AGREEMENT

KNOW ALL MEN BY THESE PRESENTS, that the undersigned, Dawn L. Strohecker, does hereby irrevocably name and appoint and retain NAUMAN, SMITH, SHISSLER & HALL, LLP to be his true and lawful attorneys to represent Dawn L. Strohecker, and take any and all such steps as they may deem necessary and proper in the handling, prosecution, trial or settlement of any claim of the undersigned against any person, corporation or other entity stemming from lost wages and violations of other state and federal laws while in the employment of Henson Trucking, and including all matters related thereto, with full power and authority to appear on behalf of the undersigned in any Court of record, administrative proceeding or any other proceeding whatsoever, to do and perform all and every act and thing whatsoever that may be requisite and necessary to be done as full to all intents and purposes as the undersigned might or could do if personally present; hereby ratifying and confirming all that said attorneys shall lawfully do or cause to be done by virtue of these presents, provided, that the attorneys shall not have the authority to settle said claim without our prior approval, whether oral or in writing.

AND IN CONSIDERATION of the services performed and to be performed, it is understood by the undersigned that said attorneys shall receive either statutory attorney fee at their customary hourly rates or a sum equal to thirty-three and one-third percent (33 1/3%) of any amount recovered on account of said claim prior to any trial of the action, a sum equal to forty percent (40%) of any amount recovered during or after trial where no appeal is taken from final judgment, and a sum equal to fifty percent (50%) of any amount recovered following the taking of an appeal from any final order or judgment, whichever is greater. It is further understood and agreed to by me, the undersigned individual named above, that all expenses and costs of litigation shall be paid by me,

and that I shall pay, upon demand, all expenses and cost paid or incurred by said attorneys in connection with the preparation and handling of said claims.

IN WITNESS WHEREOF, and intending to be legally bound, this Agreement has been duly signed and sealed this 06 day of December, 2000.


Dawn L. Strohecker

WE HEREBY AGREE to act as attorneys in the above matter upon the terms and conditions hereinabove set forth.

NAUMAN, SMITH, SHISSLER AND HALL, LLP

By: 
Dennis E. Boyle, Esquire

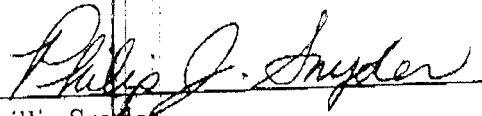
CONTINGENCY FEE AGREEMENT

KNOW ALL MEN BY THESE PRESENTS, that the undersigned, Phillip Snyder, does hereby irrevocably name and appoint and retain NAUMAN, SMITH, SHISSLER & HALL, LLP to be his true and lawful attorneys to represent Phillip Snyder, and take any and all such steps as they may deem necessary and proper in the handling, prosecution, trial or settlement of any claim of the undersigned against any person, corporation or other entity stemming from lost wages and violations of other state and federal laws while in the employment of Henson Trucking, and including all matters related thereto, with full power and authority to appear on behalf of the undersigned in any Court of record, administrative proceeding or any other proceeding whatsoever, to do and perform all and every act and thing whatsoever that may be requisite and necessary to be done as full to all intents and purposes as the undersigned might or could do if personally present; hereby ratifying and confirming all that said attorneys shall lawfully do or cause to be done by virtue of these presents, provided, that me attorneys shall not have the authority to settle said claim without our prior approval, whether oral or in writing.

AND IN CONSIDERATION of the services performed and to be performed, it is understood by the undersigned that said attorneys shall receive either statutory attorney fee at their customary hourly rates or a sum equal to thirty-three and one third percent (33 1/3%) of any amount recovered on account of said claim prior to any trial of the action, a sum equal to forty percent (40%) of any amount recovered during or after trial where no appeal is taken from final judgment, and a sum equal to fifty percent (50%) of any amount recovered following the taking of an appeal from any final order or judgment, whichever is greater. It is further understood and agreed to by me, the undersigned individual named above, that all expenses and costs of litigation shall be paid by me,


and that I shall pay, upon demand, all expenses and cost paid or incurred by said attorneys in connection with the preparation and handling of said claims.

IN WITNESS WHEREOF, and intending to be legally bound, this Agreement has been duly signed and sealed this _____ day of _____, 2000.


Phillip Snyder

WE HEREBY AGREE to act as attorneys in the above matter upon the terms and conditions hereinabove set forth.

NAUMAN, SMITH, SHISSLER AND HALL, LLP

By: 
Dennis E. Boyle, Esquire

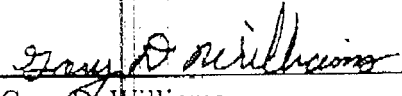
CONTINGENCY FEE AGREEMENT

KNOW ALL MEN BY THESE PRESENTS, that the undersigned, Gary D. Williams, does hereby irrevocably name and appoint and retain NAUMAN, SMITH, SHISSLER & HALL, LLP to be his true and lawful attorneys to represent Gary D. Williams, and take any and all such steps as they may deem necessary and proper in the handling, prosecution, trial or settlement of any claim of the undersigned against any person, corporation or other entity stemming from lost wages and violations of other state and federal laws while in the employment of Henson Trucking, and including all matters related thereto, with full power and authority to appear on behalf of the undersigned in any Court of record, administrative proceeding or any other proceeding whatsoever, to do and perform all and every act and thing whatsoever that may be requisite and necessary to be done as full to all intents and purposes as the undersigned might or could do if personally present; hereby ratifying and confirming all that said attorneys shall lawfully do or cause to be done by virtue of these presents, provided, that the attorneys shall not have the authority to settle said claim without our prior approval, whether oral or in writing.

AND IN CONSIDERATION of the services performed and to be performed, it is understood by the undersigned that said attorneys shall receive either statutory attorney fee at their customary hourly rates or a sum equal to thirty-three and one-third percent (33 $\frac{1}{3}$ %) of any amount recovered on account of said claim prior to any trial of the action, a sum equal to forty percent (40%) of any amount recovered during or after trial where no appeal is taken from final judgment, and a sum equal to fifty percent (50%) of any amount recovered following the taking of an appeal from any final order or judgment, whichever is greater. It is further understood and agreed to by me, the undersigned individual named above, that all expenses and costs of litigation shall be paid by me,

and that I shall pay, upon demand, all expenses and cost paid or incurred by said attorneys in connection with the preparation and handling of said claims.

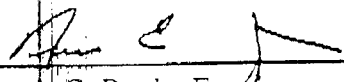
IN WITNESS WHEREOF, and intending to be legally bound, this Agreement has been duly signed and sealed this _____ day of _____, 2000.



Gary D. Williams

WE HEREBY AGREE to act as attorneys in the above matter upon the terms and conditions hereinabove set forth.

NAUMAN, SMITH, SHISSLER AND HALL, LLP

By: 

Dennis E. Boyle, Esquire

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

GARY D. WILLIAMS, TERRY	:	CONSOLIDATED NO. 1:CV-00-1838
BRUNNER, DAVID A. BAKER,	:	
PHILLIP J. SNYDER, CRAIG W.	:	
JACOBS, DAWN L. STROHECKER,	:	
and KURT A. EVANS,	:	
PLAINTIFFS	:	
	:	
v.	:	(JUDGE SYLVIA H. RAMBO)
	:	
HENSON TRANSPORT, INC.,	:	
HENSON TRUCK LEASING, INC.,	:	
and BARRY HENSON,	:	
DEFENDANTS	:	JURY TRIAL DEMANDED

DUPLICATION OF HOURS

<u>Date</u>	<u>Atty.</u>	<u>Matter</u>	<u>Time</u>	<u>Client</u>
9/10/2000	DEB	Draft of Complaint	4.4 Hours	Williams
9/10/2000	DEB	Draft of Complaint	5.4 Hours	Snyder
10/05/2000	DEB	Review/revise Complaint	1.4 Hours	Williams
10/05/2000	DEB	Review/revise Complaint	1.4 Hours	Snyder
10/16/2000	DEB	Finalize Complaint for Filing	1.8 Hours	Williams
10/16/2000	DEB	Finalize Complaint for Filing	1.8 Hours	Snyder
10/18/2000	DEB	Research service requirements	.8 Hours	Williams
10/18/2000	DEB	Research service requirements	.8 Hours	Snyder
11/28/2000	DEB	Research applicability of FLSA to Mr. Williams	3.4 Hours	Williams

DUPLICATION OF HOURS – Page 2

<u>Date</u>	<u>Atty.</u>	<u>Matter</u>	<u>Time</u>	<u>Client</u>
11/28/2000	DEB	Research applicability of FLSA standards to clients	3.4 Hours	Snyder
12/1/2000	DEB	Letter Clerk's Office	.3 Hours	Williams
12/1/2000	DEB	Letter Clerk's Office	.3 Hours	Snyder
12/05/2000	JAB	Preparation of interrogatories	2.6 Hours	Williams
12/05/2000	JAB	Preparation of interrogatories	2.6 Hours	Snyder
12/05/2000	JAB	Preparation of interrogatories	2.6 Hours	Strohecker
12/06/2000	DEB	Review discovery rules and local rules; conf w/ LLD re: completion of interrogatories and request for production	1.7 Hours	Williams
12/06/2000	DEB	Review discovery rules and local rules; conf w/ LLD re: completion of interrogatories and request for production	1.7 Hours	Snyder
12/06/2000	DEB	Review discovery rules and local rules; conf w/ LLD re: completion of interrogatories and request for production	1.7 Hours	Strohecker
12/10/2000	DEB	Review/revise interrogatories & request for production	1.0 Hours	Williams
12/10/2000	DEB	Review/revise interrogatories & request for production	1.0 Hours	Snyder
12/10/2000	DEB	Review/revise interrogatories & request for production	1.0 Hours	Strohecker

DUPLICATION OF HOURS – Page 3

<u>Date</u>	<u>Atty.</u>	<u>Matter</u>	<u>Time</u>	<u>Client</u>
12/12/2000	DEB	T/C Clerk's office	.4 Hours	Williams
12/12/2000	DEB	T/C Clerk's office	.4 Hours	Snyder
12/12/2000	DEB	T/C Clerk's office	.4 Hours	Strohecker
12/14/2000	DEB	Preparation of return of service ltr Clerk of Court	.5 Hours	Williams
12/14/2000	DEB	Preparation of return of service ltr Clerk of Court	.5 Hours	Snyder
12/28/2000	JAB	Revise Interrogatories	1.5 Hours	Williams
12/28/2000	JAB	Revisions and preparation of Interrogatories	1.5 Hours	Snyder
12/28/2000	JAB	Review interrogatories	1.5 Hours	Strohecker
12/29/2000	JAB	Review/revise interrogatories and request for production	.7 Hours	Williams
12/29/2000	JAB	Review/revise discovery documents	.7 Hours	Snyder
12/29/2000	JAB	Review/revise interrogatories and request for production	.7 Hours	Strohecker
1/2/2001	DEB	T/C J. Handelman, Esq.; conf. w/ clients.	1.3 Hours	Williams
1/2/2001	DEB	T/C J. Handelman, Esq.; conf. w/ clients.	1.3 Hours	Snyder
1/2/2001	DEB	T/C J. Handelman, Esq.; conf. w/ clients.	1.3 Hours	Strohecker

DUPLICATION OF HOURS – Page 4

<u>Date</u>	<u>Atty.</u>	<u>Matter</u>	<u>Time</u>	<u>Client</u>
1/10/2001	LLD	Finalize Plaintiff's discovery requests to all defendants	1.1 Hours	Williams
1/10/2001	LLD	Finalize Plaintiff's discovery requests to all defendants	1.1 Hours	Snyder
1/10/2001	JAB	Research Rule 9(b) reqs.; memo to DEB	1.4 Hours	Williams
1/10/2001	JAB	Research Rule 9(b) reqs.; memo to DEB	1.4 Hours	Snyder
1/10/2001	JAB	Research Rule 9(b) reqs.; memo to DEB	1.4 Hours	Strohecker
1/19/2001	DEB	Review records in prep. for case management conf.	1.4 Hours	Williams
1/19/2001	DEB	Review records in prep. for case management conf.	1.4 Hours	Snyder
1/19/2001	DEB	Review records in prep. for case management conf.	1.4 Hours	Strohecker
1/25/2001	DEB	Ltr. Inv. N. Marks; Dept of Labor	.3 Hours	Williams
1/25/2001	DEB	Ltr. Inv. N. Marks; Dept of Labor	.3 Hours	Snyder
1/25/2001	DEB	Ltr. Inv. N. Marks; Dept of Labor	.3 Hours	Strohecker

DUPLICATION OF HOURS – Page 5

<u>Date</u>	<u>Atty.</u>	<u>Matter</u>	<u>Time</u>	<u>Client</u>
1/29/01	DEB	Draft case management plan	1.10 Hours	Williams
1/29/01	DEB	Draft joint case management plan	1.10 Hours	Snyder
1/29/01	DEB	Draft case management plan	1.10 Hours	Strohecker
1/30/01	DEB	Review/revise joint case management plan	.4 Hours	Williams
1/30/01	DEB	Review/revise joint case management plan	.4 Hours	Snyder
1/30/01	DEB	Review/revise joint case management plan	.4 Hours	Strohecker
2/02/01	DEB	Ltr. Clerk of Court	.3 Hours	Williams
2/02/01	DEB	Ltr. Clerk of Court	.3 Hours	Snyder
2/24/01	DEB	Review employee records supplied by G. Williams	.2 Hours	Williams
2/24/01	DEB	Review employee records supplied by G. Williams	.2 Hours	Snyder
2/24/01	DEB	Review employee records supplied by G. Williams	.2 Hours	Strohecker
2/26/01	DEB	Draft ltr. to J. Handelman, Esq.	.2 Hours	Williams
2/26/01	DEB	Ltr. J. Handelman, Esq.	.2 Hours	Snyder
2/26/01	DEB	Draft ltr. to J. Handelman, Esq.	.2 Hours	Strohecker

DUPLICATION OF HOURS – Page 6

<u>Date</u>	<u>Atty.</u>	<u>Matter</u>	<u>Time</u>	<u>Client</u>
3/13/01	DEB	Review records from R. Dowling	.4 Hours	Williams
3/13/01	DEB	Review records supplied by R. Dowling	.4 Hours	Williams
3/13/01	JAB	Review records supplied by R. Dowling	.4 Hours	Williams
3/13/01	JAB	Review records supplied by R. Dowling	.4 Hours	Snyder
3/13/01	DEB	Review records supplied by R. Dowling	.4 Hours	Strohecker
3/13/01	JAB	Review records supplied by R. Dowling	.4 Hours	Strohecker
4/11/01	DEB	Ltr J. McNally, Esq.	.1 Hour	Williams
4/11/01	DEB	Ltr J. McNally, Esq.	.1 Hour	Snyder
4/11/01	DEB	Ltr J. McNally, Esq.	.1 Hour	Strohecker
4/25/01	DEB	Conf. w/JAB re: discovery reports	.4 Hours	Williams
4/25/01	JAB	Conf. w/DEB re: discovery response	.4 Hours	Williams
4/25/01	DEB	Conf. w/JAB re: discovery responses	.4 Hours	Snyder
4/25/01	JAB	Conf. w/DEB re: discovery responses	1.4 Hours	Snyder

DUPLICATION OF HOURS – Page 7

<u>Date</u>	<u>Atty.</u>	<u>Matter</u>	<u>Time</u>	<u>Client</u>
4/25/01	DEB	Conf. w/JAB re: discovery responses	.4 Hours	Strohecker
4/25/01	JAB	Conf. w/DEB re: discovery responses	.4 Hours	Strohecker
4/25/01	LLD	Conf. w/JAB & DEB; review & begin index of discovery responses	.8 Hours	Williams
4/25/01	LLD	Meeting with DEB & JAB; Review and index of defendant's discovery documents	.8 Hours	Snyder
4/25/01	LLD	Conf. w/JAB, DEB; review & begin index of defendants discovery responses	.8 Hours	Strohecker
4/26/01	LLD	Continue review & indexing of discovery responses	1.4 Hours	Williams
4/26/01	LLD	Continue review & index of Defendants' discovery Documents; Notice of Depositions For Frankie Henson and Barry Henson; draft correspondence To John J. McNally, Esq.; t/c & correspondence to Cheryl of Filius & McLucas; email to DEB & JAB	1.4 Hours	Snyder
4/26/01	LLD	Continue indexing of discovery responses	1.4 Hours	Strohecker
4/26/01	DEB	Continue review of discovery responses	.4 Hours	Williams

DUPLICATION OF HOURS – Page 8

<u>Date</u>	<u>Atty.</u>	<u>Matter</u>	<u>Time</u>	<u>Client</u>
4/26/01	DEB	Continue review of discovery responses	.4 Hours	Snyder
4/26/01	DEB	Continue review of discovry (<i>sic</i>) responses	.4 Hours	Strohecker
5/03/01	DEB	Continue review of discovery responses	.5 Hours	Williams
5/03/01	DEB	Review current discovery documents; conf. w/JAB & LLD; t/c D. Baker	.5 Hours	Snyder
5/03/01	DEB	Continue review of discovery responses	.5 Hours	Strohecker
5/03/01	JAB	Review discovery responses	.6 Hours	Williams
5/03/01	JAB	Review discovery responses	.6 Hours	Snyder
5/03/01	JAB	Continue review discovery responses	.6 Hours	Strohecker
5/23/01	DEB	T/c T. Leitzel, Esq., U.S. Dept. of Labor	.1 Hour	Williams
5/23/01	DEB	T/c T. Leitzel, Esq., U.S. Dept. of Labor	.1 Hour	Snyder
5/23/01	DEB	T/c T. Leitzel, Esq., U.S. Dept. of Labor	.1 Hour	Strohecker
5/30/01	LLD	T/c with client	.2 Hours	Williams
5/30/01	LLD	T/c with client	.2 Hours	Snyder

DUPLICATION OF HOURS – Page 9

<u>Date</u>	<u>Atty.</u>	<u>Matter</u>	<u>Time</u>	<u>Client</u>
5/30/01	DEB	Complete review of discovery responses	.8 Hours	Williams
5/30/01	DEB	Complete review of discovery responses	.8 Hours	Snyder
5/30/01	DEB	Complete review of discovery responses	.8 Hours	Strohecker
6/01/01	LLD	Meeting with JAB & DEB review of documents for deposition preparation; correspondence to client	.9 Hours	Williams
6/01/01	LLD	Meeting with JAB & DEB review of documents for deposition preparation; correspondence to client	.9 Hours	Williams
6/01/01	LLD	Meeting with JAB & DEB review of documents for deposition preparation	.7 Hours	Strohecker
6/04/01	LLD	Review discovery requests	.2 Hours	Williams
6/04/01	LLD	Review discovery requests	.2 Hours	Snyder
6/04/01	LLD	Review discovery requests	.2 Hours	Strohecker
6/06/01	LLD	Meeting with DEB & JAB	.2 Hours	Williams
6/06/01	LLD	Meeting with DEB & JAB	.2 Hours	Snyder
6/06/01	LLD	Meeting with DEB & JAB	.2 Hours	Strohecker

DUPLICATION OF HOURS – Page 10

<u>Date</u>	<u>Atty.</u>	<u>Matter</u>	<u>Time</u>	<u>Client</u>
6/08/01	DEB	Begin preparation for deposition of B. Henson & F. Henson	1.1 Hours	Williams
6/08/01	DEB	Begin preparation for depositions	1.1 Hours	Snyder
6/08/01	DEB	Begin preparation for deposition of B. Henson & F. Henson	1.1 Hours	Strohecker
6/09/01	DEB	Continue preparation for deposition of B. Henson & F. Henson	1.2 Hours	Williams
6/09/01	DEB	Continue preparation for depositions	1.2 Hours	Snyder
6/09/01	DEB	Continue preparation for depositions of B. Henson & F. Henson	1.2 Hours	Strohecker
6/11/01	DEB	Continue preparation for deposition of B. Henson & F. Henson	.7 Hours	Williams
6/11/01	DEB	Continue preparation for depositions	.7 Hours	Snyder
6/11/01	DEB	Continue preparation for deposition of B. Henson & F. Henson	.7 Hours	Strohecker

DUPLICATION OF HOURS – Page 11

<u>Date</u>	<u>Atty.</u>	<u>Matter</u>	<u>Time</u>	<u>Client</u>
6/12/01	DEB	Complete preparation for deposition of B. Henson; attend deposition	2.7 Hours	Williams
6/12/01	DEB	Preparation for deposition of B. Henson; attend deposition of B. Henson; t/c D. Baker & G. Williams	2.7 Hours	Snyder
6/12/01	DEB	Complete preparation for deposition of B. Henson; attend depositions	2.7 Hours	Strohecker
6/14/01	LLD	Incorporate Dept. of Labor records into notebook	.4 Hours	Williams
6/14/01	LLD	Incorporate Dept. of Labor records into notebooks	.4 Hours	Snyder
6/14/01	LLD	Incorporate Dept. of Labor records into notebook	.4 Hours	Strohecker
6/29/01	DEB	Review additional discovery responses	2.1 Hours	Williams
6/29/01	DEB	Review discovery responses	2.1 Hours	Snyder
6/29/01	DEB	Review additional discovery responses	2.1 Hours	Strohecker
7/31/01	DEB	T/c J. Handelman (2) re: status of Henson discovery responses	.1 Hours	Williams

DUPLICATION OF HOURS – Page 12

<u>Date</u>	<u>Atty.</u>	<u>Matter</u>	<u>Time</u>	<u>Client</u>
7/31/01	DEB	T/c J. Handelman (2) re: status of Henson's discovery responses	.1 Hours	Snyder
7/31/01	DEB	T/c J. Handelman (2) re: status of Henson discovery responses	.1 Hours	Strohecker
8/15/01	LLD	T/c with client	.2 Hours	Williams
8/15/01	LLD	T/c with client	.2 Hours	Snyder
8/15/01	LLD	T/c to client	.2 Hours	Strohecker
8/17/01	LLD	T/c and correspondence to client	.4 Hours	Williams
8/17/01	LLD	T/c and correspondence to client	.2 Hours	Snyder
8/17/01	LLD	T/c and correspondence to client; email to JAB & DEB	.4 Hours	Strohecker
8/18/01	JAB	Research re: piercing corporate veil	.5 Hours	Williams
8/18/01	JAB	Research re: piercing corporate veil	.5 Hours	Strohecker
8/19/01	JAB	Preparation for deposition of B. Henson, S. Henson & F. Henson	1.1 Hours	Williams

DUPLICATION OF HOURS – Page 13

<u>Date</u>	<u>Atty.</u>	<u>Matter</u>	<u>Time</u>	<u>Client</u>
8/19/01	JAB	Preparation for depositions; conf. w/DEB re: piercing corporate veil	1.1 Hours	Snyder
8/19/01	JAB	Preparation for deposition of B. Henson, S. Henson & F. Henson	1.1 Hours	Strohecker
8/20/01	JAB	Continue preparation for deposition of B. Henson, S. Henson & F. Henson	2.0 Hours	Williams
8/20/01	JAB	Preparation for depositions	2.0 Hours	Snyder
8/20/01	JAB	Preparation for deposition of B. Henson, S. Henson & F. Henson	2.0 Hours	Strohecker
8/23/01	JAB	Attend deposition of B. Henson & S. Henson	1.8 Hours	Williams
8/23/01	JAB	Deposition of Barry & Stephanie Henson	1.8 Hours	Snyder
8/23/01	JAB	Deposition of B. Henson & S. Henson	1.8 Hours	Strohecker
8/28/01	LLD	Review and list documents	.2 Hours	Williams
8/28/01	LLD	Review, organize and list documents received from client; list showing dates of employment from various sources	1.7 Hours	Snyder

DUPLICATION OF HOURS – Page 14

<u>Date</u>	<u>Atty.</u>	<u>Matter</u>	<u>Time</u>	<u>Client</u>
8/28/01	LLD	Review and list documents	.2 Hours	Strohecker
9/04/01	JAB	Research re: piercing the corporate veil; instrumentality and single enterprise theory	1.9 Hours	Williams
9/04/01	JAB	Research re: piercing the corporate veil; instrumentality & single enterprise theory	1.9 Hours	Snyder
9/04/01	JAB	Research re: piercing the corporate veil; instrumentality and single enterprise theory	1.9 Hours	Strohecker
9/07/01	JAB	T/c to J. Handelman, Esq.	.1 Hours	Williams
9/07/01	JAB	T/c to J. Handelman, Esq.; v-mail to J. Handelman	.1 Hours	Snyder
9/07/01	JAB	T/c to J. Handelman, Esq.	.1 Hours	Strohecker
9/25/01	DEB	Review defendants brief in support of summary judgment	.5 Hours	Williams
9/25/01	DEB	Review of defendants brief in support of summary judgment	.5 Hours	Snyder
9/25/01	DEB	Review of defendants brief in support of summary judgment	.5 Hours	Strohecker
9/26/01	JAB	Preparation of brief in opposition to summary judgment	1.7 Hours	Williams
9/26/01	JAB	Begin preparation of brief in opposition to summary judgment	1.6 Hours	Williams

DUPLICATION OF HOURS – Page 15

<u>Date</u>	<u>Atty.</u>	<u>Matter</u>	<u>Time</u>	<u>Client</u>
9/26/01	JAB	Begin preparation of brief in opposition to summary judgment	1.6 Hours	Snyder
9/26/01	JAB	Begin preparation of brief in opposition to summary judgment	1.6 Hours	Strohecker
9/27/01	JAB	Preparation of brief in opposition to summary judgment	1.3 Hours	Williams
9/27/01	JAB	Preparation of brief in opposition to summary judgment	1.3 Hours	Snyder
9/27/01	JAB	Preparation of brief in opposition to summary judgment	1.3 Hours	Strohecker
10/1/01	DEB	Continue review/revision of brief in opposition to motion for summary judgment	2.0 Hours	Williams
10/1/01	DEB	Review/revise brief in opposition to summary judgment	2.0 Hours	Snyder
10/1/01	DEB	Review/revise brief in opposition to summary judgment	2.0 Hours	Strohecker
11/21/01	DEB	Review opinion & order from Judge Rambo	.7 Hours	Williams
11/21/01	DEB	Review opinion and order of Judge Rambo	.7 Hours	Snyder
11/21/01	DEB	Review opinion & order of Judge Rambo	.7 Hours	Strohecker

DUPLICATION OF HOURS – Page 16

<u>Date</u>	<u>Atty.</u>	<u>Matter</u>	<u>Time</u>	<u>Client</u>
11/22/01	DEB	T/c client re: opinion & order	.5 Hours	Williams
11/22/01	DEB	T/c client re: opinion and order	.5 Hours	Snyder
11/22/01	DEB	T/c client re: opinion & order	.5 Hours	Strohecker
11/27/01	DEB	Ltr. to client	.4 Hours	Williams
11/27/01	DEB	Ltr. to client	.4 Hours	Williams
11/27/01	DEB	Ltr. to client	.4 Hours	Snyder
11/27/01	DEB	Ltr. to client	.4 Hours	Snyder
11/27/01	DEB	Ltr. to client	.4 Hours	Strohecker
11/27/01	DEB	Ltr. to client	.4 Hours	Strohecker
12/4/01	DEB	Review motion in limine re: U.S. Dept. of Labor records	.4 Hours	Williams
12/4/01	DEB	Review motion in limine re: U.S. Dept. of Labor records	.4 Hours	Snyder
12/4/01	DEB	Review motion in limine re: U.S. Dept. of Labor records	.4 Hours	Strohecker
12/4/01	JAB	Review motion in limine; research re: cases cited by defendants in brief	1.0 Hours	Williams
12/4/01	JAB	Review motion in limine; research re: cases cited by defendants in brief	1.0 Hours	Snyder

DUPLICATION OF HOURS – Page 17

<u>Date</u>	<u>Atty.</u>	<u>Matter</u>	<u>Time</u>	<u>Client</u>
12/4/01	JAB	Review motion in limine; research re: cases cited by defendants in brief	1.0 Hours	Strohecker
12/10/01	JAB	Preparation of response to defendant's motion in limine; research re: relevance	2.9 Hours	Williams
12/10/01	JAB	Preparation of response to defendant's motion in limine	2.9 Hours	Snyder
12/10/01	JAB	Preparation of response to defendant's motion in limine	2.9 Hours	Strohecker
12/11/01	JAB	Preparation of response to defendant's motion in limine	2.4 Hours	Williams
12/11/01	JAB	Preparation of response to defendant's motion in limine	2.4 Hours	Snyder
12/11/01	JAB	Preparation of response to defendant's motion in limine	2.4 Hours	Strohecker
12/12/01	JAB	Preparation of response to defendant's motion in limine	1.0 Hours	Williams
12/12/01	JAB	Preparation of response to defendants motion in limine	1.0 Hours	Snyder
12/12/01	JAB	Preparation of response to defendants motion in limine	1.0 Hours	Strohecker
12/14/01	JAB	Preparation of response to defendant's motion in limine	2.7 Hours	Williams

DUPLICATION OF HOURS – Page 18

<u>Date</u>	<u>Atty.</u>	<u>Matter</u>	<u>Time</u>	<u>Client</u>
12/14/01	JAB	Preparation of response to defendants motion in limine	2.7 Hours	Snyder
12/14/01	JAB	Preparation of response to defendants motion in limine	2.7 Hours	Strohecker
12/17/01	DEB	Review/revise brief in opposition to motion in limine	.8 Hours	Williams
12/17/01	DEB	Review/revise brief in opposition to motion in limine	.8 Hours	Snyder
12/17/01	DEB	Review/revise brief in opposition to motion in limine	.8 Hours	Strohecker
12/18/01	DEB	Review/revise brief in opposition to motion in limine	.9 Hours	Williams
12/18/01	DEB	Review/revise brief in opposition to motion in limine	.9 Hours	Snyder
12/18/01	DEB	Review/revise brief in opposition to motion in limine	.8 Hours	Strohecker
12/21/01	DEB	Prepare draft of pre-trial memorandum	1.4 Hours	Williams
12/21/01	DEB	Prepare draft of pre-trial memorandum	1.4 Hours	Snyder
12/21/01	DEB	Prepare draft of pre-trial memorandum	1.4 Hours	Strohecker
12/23/01	DEB	Review/revise pre-trial statement	3.4 Hours	Williams

DUPLICATION OF HOURS – Page 19

<u>Date</u>	<u>Atty.</u>	<u>Matter</u>	<u>Time</u>	<u>Client</u>
12/23/01	DEB	Review/revise pre-trial memorandum	3.4 Hours	Snyder
12/23/01	DEB	Review/revise pre-trial memorandum	3.4 Hours	Strohecker
12/26/01	DEB	Review/revise pre-trial statement	.2 Hours	Williams
12/26/01	DEB	Review/revise pre-trial memorandum	.2 Hours	Snyder
12/26/01	DEB	Review/revise pre-trial memorandum	.2 Hours	Strohecker
12/27/01	DEB	T/c J. Handelman, Esq. (2)	.2 Hours	Williams
12/27/01	DEB	T/c J. Handelman, Esq. (2)	.2 Hours	Snyder
12/27/01	DEB	T/c J. Handelman, Esq. (2)	.2 Hours	Strohecker
2/7/02	JAB	Research re: liquidated damages	1.3 Hours	Williams
2/7/02	JAB	Research re: liquidated damages	1.3 Hours	Snyder
2/7/02	JAB	Research re: liquidated damages	1.3 Hours	Strohecker
2/7/02	JAB	Preparation of petitions and brief for attorneys fees	1.3 Hours	Williams
2/7/02	JAB	Preparation of petitions and brief for attorneys fees	1.3 Hours	Snyder

DUPLICATION OF HOURS – Page 20

<u>Date</u>	<u>Atty.</u>	<u>Matter</u>	<u>Time</u>	<u>Client</u>
2/7/02	JAB	Preparation of petitions and brief for attorneys fees	1.3 Hours	Strohecker
2/8/02	JAB	Preparation of petition for	1.0 Hour	Williams
2/8/02	JAB	Preparation of petition for	1.0 Hour	Snyder
2/8/02	JAB	Preparation of petition for	1.0 Hour	Strohecker

DUPLICATION – Page 21Disbursements

<u>Date</u>	<u>Description</u>	<u>Amount</u>	<u>Client</u>
1/31/01	1 Postage Charge	3.95	Williams
1/31/01	1 Postage Charge	3.95	Snyder
1/31/01	1 Postage Charge	3.95	Strohecker
1/31/01	125 Photocopy Charge	2.50	Williams
1/31/01	125 Photocopy Charge	2.50	Snyder
1/31/01	125 Photocopy Charge	2.50	Strohecker
1/31/01	2 Postage Charge	1.58	Williams
1/31/01	2 Postage Charge	1.58	Snyder
1/31/01	2 Postage Charge	1.58	Strohecker
2/28/01	126 Photocopy Charge	4.20	Williams
2/28/01	126 Photocopy Charge	4.20	Snyder
2/28/01	126 Photocopy Charge	4.20	Strohecker
2/28/01	4 Postage Charge	3.46	Williams
2/28/01	4 Postage Charge	3.46	Snyder
2/28/01	4 Postage Charge	3.46	Strohecker

DUPLICATION – Page 22Disbursements

<u>Date</u>	<u>Description</u>	<u>Amount</u>	<u>Client</u>
2/28/01	34 Telefax Charge	2.26	Williams
2/28/01	34 Telefax Charge	2.26	Snyder
2/28/01	34 Telefax Charge	2.26	Strohecker
3/13/01	Check #23404 to Laura Dobbin; mileage	1.72	Williams
3/13/01	Check #23404 to Laura Dobbin; mileage	1.72	Snyder
3/13/01	Check #23404 to Laura Dobbin; mileage	1.72	Strohecker
3/13/01	322 Photocopy Charge	6.44	Williams
3/13/01	322 Photocopy Charge	6.44	Snyder
3/13/01	322 Photocopy Charge	6.44	Strohecker
4/12/01	Check #23532 to Laura Dobbin; mileage	4.04	Williams
4/12/01	Check #23532 to Laura Dobbin; mileage	4.04	Snyder
4/12/01	Check #23532 to Laura Dobbin; mileage	4.04	Strohecker

DUPLICATION – Page 23Disbursements

<u>Date</u>	<u>Description</u>	<u>Amount</u>	<u>Client</u>
5/31/01	127 Photocopy Charge	1.81	Williams
5/31/01	127 Photocopy Charge	1.81	Snyder
5/31/01	127 Photocopy Charge	1.81	Strohecker
6/12/01	Check #23768 to Jodi A. Beierschmitt; meeting with Robert Dowling	.99	Williams
6/12/01	Check #23768 to Jodi A. Beierschmitt; meeting with Robert Dowling	.99	Snyder
6/12/01	Check #23768 to Jodi A. Beierschmitt; meeting with Robert Dowling	.99	Strohecker
6/12/01	Check #23772 to Dennis E. Boyle; Travel to/from Lewisberry to Interview witness	.69	Williams
6/12/01	Check #23772 to Dennis E. Boyle; Travel to/from Lewisberry to Interview witness	.69	Snyder
6/12/01	Check #23772 to Dennis E. Boyle; Travel to/from Lewisberry to Interview witness	.69	Strohecker

DUPLICATION – Page 24Disbursements

<u>Date</u>	<u>Description</u>	<u>Amount</u>	<u>Client</u>
6/30/01	160 Photocopy Charge	5.33	Williams
6/30/01	160 Photocopy Charge	5.33	Snyder
6/30/01	160 Photocopy Charge	5.33	Strohecker
7/11/01	Check #23900 to William Reese; subpoena fee	5.00	Williams
7/11/01	Check #23900 to William Reese; subpoena fee	5.00	Snyder
7/11/01	Check #23900 to William Reese; subpoena fee	5.00	Strohecker
7/11/01	Check #23903 to Filius & McLucas Reporting Service; deposition Transcript	32.94	Williams
7/11/01	Check #23903 to Filius & McLucas Reporting Service; deposition Transcript	32.94	Snyder
7/11/01	Check #23903 to Filius & McLucas Reporting Service; deposition Transcript	32.94	Strohecker
7/31/01	190 Photocopy Charge	6.33	Williams
7/31/01	190 Photocopy Charge	6.33	Snyder
7/31/01	190 Photocopy Charge	6.33	Strohecker

DUPLICATION – Page 25Disbursements

<u>Date</u>	<u>Description</u>	<u>Amount</u>	<u>Client</u>
8/31/01	89 Photocopy Charge	2.97	Williams
8/31/01	89 Photocopy Charge	2.97	Snyder
8/31/01	89 Photocopy Charge	2.97	Strohecker
8/31/01	Check #24129 to Filius & McLucas Reporting Service; payment for Deposition transcripts of Hensons	45.61	Williams
8/31/01	Check #24129 to Filius & McLucas Reporting Service; payment for Deposition transcripts of Hensons	45.61	Snyder
8/31/01	Check #24129 to Filius & McLucas Reporting Service; payment for Deposition transcripts of Hensons	45.61	Strohecker
9/14/01	Check #24168 to Filius & McLucas Reporting Service; payment for depo. transcripts	139.93	Williams
9/14/01	Check #24168 to Filius & McLucas Reporting Service; payment for depo. transcripts	139.93	Snyder
9/14/01	Check #24168 to Filius & McLucas Reporting Service; payment for depo. transcripts	139.93	Strohecker

DUPLICATION – Page 26Disbursements

<u>Date</u>	<u>Description</u>	<u>Amount</u>	<u>Client</u>
9/25/01	Check #24221 to Rose C. Sullivan; Notary fee	2.00	Williams
9/25/01	Check #24221 to Rose C. Sullivan; Notary fee	2.00	Snyder
9/25/01	Check #24221 to Rose C. Sullivan; Notary fee	2.00	Strohecker
9/30/01	2738 Photocopy Charge	91.27	Williams
9/30/01	2738 Photocopy Charge	91.27	Snyder
9/30/01	2738 Photocopy Charge	91.27	Strohecker
10/31/01	340 Photocopy Charge	11.33	Williams
10/31/01	340 Photocopy Charge	11.33	Snyder
10/31/01	340 Photocopy Charge	11.33	Strohecker
11/30/01	31 Photocopy Charge	12.03	Williams
11/30/01	31 Photocopy Charge	12.03	Snyder
11/30/01	31 Photocopy Charge	12.03	Strohecker

C

HOURS EXPENDED PRIOR TO 12/4/01

No. of Plaintiffs Charged	DATE	HOURS BILLED		7	RATE	DIFFERENCE
	9/10/00	5.4		0.9	\$140	\$756/\$126
			(4.5)			(\$630)
	10/5/00	1.4		0.2	\$140	\$196/\$28
			(1.2)			(-\$168)
	10/16/00	1.8		0.3	\$140	\$252/\$42
			(1.5)			(\$210)
	10/18/00	0.8		0.1	\$140	\$112/\$14
			(.7)			(\$98)
	11/28/00	3.4		0.5	\$140	\$476/\$70
			(2.9)			(\$406)
	12/1/00	0.3		0.1	\$140	\$42/\$14
			(.2)			(\$28)
(3)	12/5/00	2.6		0.4	\$90	\$234/\$36
			(2.2)			(\$198)
(3)	12/6/00	1.7		0.2	\$140	\$232/\$28
			(1.5)			(\$210)
(3)	12/10/00	1		0.1	\$140	\$140/\$14
			(.9)			(\$126)
(3)	12/12/00	0.4		0.1	\$140	\$56/\$14
			(.3)			(\$42)
	12/14/00	0.5		0.1	\$140	\$70/\$14
			(.4)			(\$56)
(3)	12/28/00	1.5		0.2	\$90	\$135/\$18
			(1.3)			(\$117)
(3)	12/29/00	0.7		0.1	\$90	\$63/\$9
			(.6)			(\$54)
(3)	1/2/01	1.3		0.2	\$140	\$182/\$28
			(1.1)			(\$154)
	1/10/01	1.1		0.2	\$60	\$66/\$12
			(.9)			(\$54)
(3)	1/10/01	1.4		0.2	\$90	\$126/\$18
			(1.2)			(\$108)
(3)	1/19/01	1.4		0.2	\$140	\$196/\$28
			(1.2)			(\$168)
(3)	1/25/01	0.3		(.1)	\$140	\$42/\$14
			(.2)			(\$28)
(3)	1/29/01	1.1		0.2	\$140	\$154/\$28
			(.9)			(\$126)
(3)	1/30/01	0.4		0.1	\$140	\$56/\$14
			(.3)			(\$42)
	2/2/01	0.3		(.1)	\$140	\$42/\$14
			(.2)			(\$28)
(3)	2/24/01	0.2		0.03	\$140	\$28/\$4.2
			(.17)			(\$23.80)
(3)	2/26/01	0.2		0.03	\$140	\$28/\$4.2
			(.17)			(\$23.80)

No. of Plaintiffs Charged	DATE	HOURS BILLED	·/·7	RATE	DIFFERENCE
(3)	3/13/01	0.4	0.1	\$140	\$56/\$14
		(.3)			(\$42)
(3)	3/13/01	0.4	0.1	\$90	\$36/\$9
		(.3)			(\$27)
	4/11/01	Not Included			
	4/25/01	0.4	0.1	\$140	\$56/\$14
		(.3)			(\$42)
(3)	4/25/01	0.4	0.1	\$90	\$36/\$9
		(.3)			(\$27)
(3)	4/25/01	0.8	0.1	\$60	\$48/\$6
		(.7)			(\$42)
(3)	4/26/01	1.4	0.2	\$60	\$84/\$12
		(1.2)			(\$72)
(3)	4/26/01	0.4	0.1	\$140	\$56/\$14
		(.3)			(\$42)
(3)	5/3/01	0.5	0.1	\$140	\$70/\$14
		(.4)			(\$56)
(3)	5/3/01	0.6	0.1	\$90	\$54/\$9
		(.5)			(\$45)
	5/23/01	Not Included			
	5/30/01	0.2	0.1	\$60	\$12/\$6
		(.1)			(\$6)
(3)	5/30/01	0.8	0.1	\$140	\$112/\$14
		(.7)			(\$98)
	6/1/01	0.9	0.1	\$60	\$54/\$6
		(.8)			(\$48)
(3)	6/4/01	0.2	0.1	\$60	\$12/\$6
		(.1)			(\$6)
(3)	6/6/01	0.2	0.1	\$140	\$12/\$6
		(.1)			(\$6)
(3)	6/8/01	1.1	0.2	\$140	\$154/\$28
		(.9)			(\$126)
(3)	6/9/01	1.2	0.2	\$140	\$168/\$28
		(1.0)			(\$140)
(3)	6/11/01	0.7	0.1	\$140	\$98/\$14
		(.6)			(\$84)
(3)	6/12/01	2.7	0.4	\$140	\$378/\$56
		(2.3)			(\$322)
(3)	6/14/01	0.4	0.1	\$60	\$24/\$6
		(.3)			(\$18)
(3)	6/29/01	2.1	0.3	\$140	\$294/\$42
		(1.8)			(\$252)
	7/31/01	Not Included			
	8/15/01	Not Included			

D

HOURS EXPENDED AFTER 12/4/01

DATE	HOURS BILLED		/ 3	RATE	DIFFERENCE
12/4/01	0.4		0.1	\$140	\$56/\$14
		(.3)			(\$42)
12/4/01	1.0		0.3	\$90	\$90/\$27
		(.7)			(\$63)
12/10/01	2.9		1	\$90	\$261/\$90
		(1.9)			(\$171)
12/11/01	2.4		0.8	\$90	\$216/\$72
		(1.6)			(\$144)
12/12/01	1.0		0.3	\$90	\$90/\$27
		(.7)			(\$63)
12/14/01	2.7		0.9	\$90	\$243/\$81
		(1.8)			(\$162)
12/17/01	.8		0.3	\$140	\$112/\$42
		(.5)			(\$70)
12/18/01	.9		0.3	\$140	\$126/\$42
		(.6)			(\$84)
12/21/01	1.4		0.5	\$140	\$196/\$70
		(.9)			(\$126)
12/23/01	3.4		1.1	\$140	\$476/\$154
		(2.3)			(\$322)
12/26/01	Not Included				
		(.4)			(\$56)
12/27/01	Not Included				
		(1.3)			(\$117)
2/7/02	1.3		0.4	\$90	\$117/\$36
		(.9)			(\$81)
2/7/02	1.3		0.4	\$90	\$117/\$36
		(.9)			(\$81)
2/8/02	1.0		0.3	\$90	#90/\$27
		(.7)			(\$63)

**NECESSARY REDUCTION IN TIME FOR DUPLICATION AND
REDUNDANCY PRIOR TO 12/4/01**

PLAINTIFF	<i>Necessary Reduction of Time Billed by DEB Corresponding reduction in fee</i>	<i>Necessary Reduction of Time Billed by JAB</i>	<i>Necessary Reduction of Time Billed by LLD</i>	TOTAL REDUCTION OF HOURS NECESSARY PER PLAINTIFF
WILLIAMS	32.14 \$4,499.60	15 \$1,350.00	5.9 \$354.00	53.04 \$6,203.60
SNYDER	32.14 \$4,499.60	15 \$1,350.00	5.9 \$354.00	53.04 \$6,203.60
STROHECKER	20.24 \$2,833.60	14.6 \$1,314.00	2.8 \$168.00	37.64 \$4,315.60

**NECESSARY REDUCTION IN TIME FOR DUPLICATION AND
REDUNDANCY AFTER 12/4/01 AND PRIOR TO TRIAL**

PLAINTIFF	<i>Necessary Reduction of Time Billed by DEB Corresponding reduction in fee</i>	<i>Necessary Reduction of Time Billed by JAB</i>	<i>Necessary Reduction of Time Billed by LLD</i>	<i>TOTAL REDUCTION OF HOURS NECESSARY</i>
WILLIAMS	4.6 \$644.00	9.2 \$828.00	0	13.8 \$1,472.00
SNYDER	4.6 \$644.00	9.2 \$828.00	0	13.8 \$1,472.00
STROHECKER	4.6 \$644.00	9.2 \$828.00	0	13.8 \$1,472.00

Form WH-56

TABLE 3

Names	Uncompensated Overtime	Uncompensated Overtime Liquidated Damages	Underpaid Hours	Underpaid Hours Liquidated Damages	Wage Payment Collection Law (Hours x Hourly Rate)	Wage Payment Collection Law Liquidated Damages (.25%)	Total
David A. Baker			\$1,511.10	\$1,511.10	\$13,406.00	\$3,351.50	\$19,779.70
Jeffery Brunner			\$4,826.56	\$4,826.56	\$16,073.63	\$4,018.41	\$29,745.16
Kurt A. Evans			\$136.87	\$136.87	\$4,475.53	\$1,118.88	\$5,868.15
Craig W. Jacobs			\$2,466.54	\$2,466.54	\$23,006.72	\$5,751.68	\$33,691.48
Philip J. Snyder	\$600.00	\$600.00	\$1,039.07	\$1,039.07	\$13,012.56	\$3,253.14	\$19,543.84
Dawn L. Strohecker	\$950.00	\$950.00					\$1,900.00
Gary D. Williams	\$3,957.00	\$3,957.00	\$164.28	\$164.28	\$32,038.50	\$8,009.63	\$48,290.69

TABLE 4

Names	Uncompensated Overtime	Uncompensated Overtime Liquidated Damages (Wage x 2)	Underpaid Hours	Underpaid Hours Liquidated Damages (25%)	Fair Labor Standard Act Uncompensated time (\$5.15 x # of hours)	Fair Labor Standard Act Liquidated Damages	Total
David A. Baker			\$1,511.10	\$1,511.10	\$4,186.95	\$4,186.95	\$11,396.10
Terry Brunner			\$4,826.56	\$4,826.56	\$5,752.55	\$5,752.55	\$21,158.22
Kurt A. Evans			\$136.87	\$136.87	\$1,402.86	\$1,402.86	\$3,079.46
Craig W. Jacobs			\$2,466.54	\$2,466.54	\$7,086.40	\$7,086.40	\$19,105.88
Philip J. Snyder	\$600.00	\$600.00	\$1,039.07	\$1,039.07	\$4,078.80	\$4,078.80	\$11,435.74
Dawn L. Strohecker	\$950.00	\$950.00					\$1,900.00
Gary D. Williams	\$3,957.00	\$3,957.00	\$164.28	\$164.28	\$10,042.50	\$10,042.50	\$28,327.56

CERTIFICATE OF SERVICE

I, JARAD W. HANDELMAN, ESQUIRE, do hereby certify that I served a true and correct copy of the foregoing Exhibits upon the following person by depositing same in the U.S. Mail, postage pre-paid at Hershey, Dauphin County, Pennsylvania this 1st day of March 2002.

SERVED UPON:

Dennis E. Boyle, Esquire
200 North Third Street, 18th Floor
P.O. Box 840
Harrisburg, PA 17108-0840

A handwritten signature in black ink, appearing to read 'Jarad W. Handelman', is written over a horizontal line.

JARAD W. HANDELMAN, ESQUIRE